

# **EXHIBIT 21**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,  
Plaintiff,

v.

AMAZON.COM, INC.;  
AMAZON.COM SERVICES LLC; AND  
AMAZON WEB SERVICES, INC.,

Defendants.

Case No. 7:24-CV-00030-ADA-DTG

**AMAZON'S INITIAL PROPOSED CLAIM CONSTRUCTIONS**

Pursuant to the Court's Second Amended Scheduling Order (Dkt. 59), Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc. provide their preliminary list of proposed claim constructions.

Defendants reserve the right to amend this list. Defendants' list is based on Plaintiff's infringement contentions and Defendants' analysis and investigation to date. Defendants reserve the right to amend their list in response to: the parties' discussions, including those required under the Court's scheduling order; any other positions taken by Plaintiff regarding the construction or meaning of claim terms; any additional relevant information learned through discovery, including any additional information about Plaintiff's infringement theories; any supplementation of or amendments to Plaintiff's infringement contentions; any relevant proceedings before the Patent and Trademark Office; any proceedings in Plaintiff's other pending cases; and any orders of the Court.

To the extent the claim language identified below includes terms appropriate to be construed or considered for indefiniteness separately, such terms are deemed part of this disclosed list. Similarly, to the extent it is appropriate to consider terms listed below in the context of additional claim language, such additional language is deemed part of this disclosure. Some of the entries identified below may be grouped together for purposes of claim construction and briefing. To the extent the same claim language appears in other claims not expressly listed in the table below, such claims are deemed part of this list.

Amazon preliminarily identifies the following constructions:

Claim Language	Patent Claims	Construction
“shared library”	’058 patent, claims 1, 2, 10	An application library code space shared among all user mode applications. The code space is different than that occupied by the kernel and its associated files. The shared library files are placed in an address space that is accessible to multiple applications.
“critical system elements”	’058 patent, claim 1	Indefinite
“functional replicas”	’058 patent, claim 1	Indefinite
“forms a part of the ... software applications”	’058 patent, claim 1	resides in the same address space as the application code
“disparate computing environments”	’814 patent, claim 1	Indefinite
“processor”	’814 patent, claim 1	processing hardware
“container”	’814 patent, claims 1, 2, 4, 6, 8, 9, 10, 13, 14	An aggregate of files required to successfully execute a set of software applications on a computing platform is referred to as a container. Each container for use on a server is mutually exclusive of the other containers, such that read/write files within a container cannot be shared with other containers. The term

		“within a container”, used within this specification, is to mean “associated with a container”.
--	--	---

October 3, 2024

By: /s/ Jeremy A. Anapol

Joseph R. Re (Pro Hac Vice)  
Jeremy A. Anapol (Pro Hac Vice)  
KNOBBE MARTENS OLSON & BEAR LLP  
2040 Main Street, 14th Floor  
Irvine, CA 92614  
Telephone: 949-760-0404  
Facsimile: 949-760-9502  
[joe.re@knobbe.com](mailto:joe.re@knobbe.com)  
[jeremy.anapol@knobbe.com](mailto:jeremy.anapol@knobbe.com)

Colin B. Heidman (Pro Hac Vice)  
Christie R.W. Matthaei (Pro Hac Vice)  
Logan P. Young (Pro Hac Vice)  
KNOBBE MARTENS OLSON & BEAR LLP  
925 4th Ave, Ste 2500  
Seattle, WA 98104  
Telephone: 206-405-2000  
Facsimile: 206-405-2001  
[colin.heideman@knobbe.com](mailto:colin.heideman@knobbe.com)  
[christie.matthaei@knobbe.com](mailto:christie.matthaei@knobbe.com)  
[logan.young@knobbe.com](mailto:logan.young@knobbe.com)

Harper Estes  
Texas Bar No. 00000083  
[hestes@lcalawfirm.com](mailto:hestes@lcalawfirm.com)  
LYNCH, CHAPPELL & ALSUP  
A Professional Corporation  
Suite 700  
300 N. Marienfeld,  
Midland, Texas 79701  
Telephone: 432-683-3351  
Telecopier: 432-683-2587

*Counsel for Defendants Amazon.com, Inc.,  
Amazon.com Services, LLC and  
Amazon Web Services, Inc.*

**CERTIFICATE OF SERVICE**

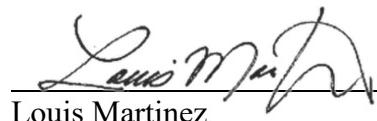
I hereby certify that, on October 3, 2024, a true and correct copy of the foregoing was served via email on the following counsel of record:

Amy Hayden  
Christian W. Conkle  
Jonathan Ma  
Marc A. Fenster  
Neil A. Rubin  
Daniel B Kolko  
Jacob R. Buczko  
James Milkey  
James S. Tsuei  
Qi (Peter) Tong  
Reza Mirzaie

RUSS AUGUST & KABAT  
12424 Wilshire Blvd. Floor 12  
Los Angeles, CA 90025  
Tel: 310-826-7474  
Fax: 310-826-6991

ahayden@raklaw.com  
cconkle@raklaw.com  
jma@raklaw.com  
mafенster@raklaw.com  
nrubin@raklaw.com  
dkolko@raklaw.com  
jbuczko@raklaw.com  
jmilkey@raklaw.com  
jtsuei@raklaw.com  
ptong@raklaw.com  
rmirzaie@raklaw.com

rak\_virtamove@raklaw.com

  
\_\_\_\_\_  
Louis Martinez